

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PROMOS TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 06-788 (JJF)
	)	
FREESCALE SEMICONDUCTOR, INC.,	)	
	)	
Defendant.	)	

**REVISED TAB 1A TO FREESCALE'S OPENING CLAIM CONSTRUCTION BRIEF**

Attached is a revised version of Tab 1A to Freescale's Opening Claim Construction Brief (D.I. 85).

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Mary B. Graham*

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Dated: December 13, 2007

**REVISED TAB 1A**  
**(TO FREESCALE'S OPENING CLAIM CONSTRUCTION BRIEF, D.I. 85)**

*ProMOS Technologies, Inc. v. Freescale Semiconductor, Inc.*, (D. Del.) CA No. 06-788 (JJF)

12-13-2007

**Parties' Proposed Claim Constructions for the Fortin '267 Patent**

<b>Fortin Claim Limitation</b>	<b>Freescale's Constructions</b>	<b>ProMOS's Constructions</b>
physical vapor deposition	A process of building up material on a surface in which the material to be deposited is released from a source of the material into a vapor phase [largely] by one or more physical mechanisms. Chemical vapor deposition is not physical vapor deposition or a type of physical vapor deposition.	A process [of accumulating material] in which films are deposited atomically by means of fluxes of individual neutral or ionic species [in a vapor phase].
chemical vapor deposition	A process of building up material on a surface in which a vapor formed with one or more chemical species that contain the material to be deposited, or components of the material to be deposited, undergoes suitable chemical reaction that enables the material being deposited to be released from the starting chemical species and accumulate on the deposition surface. Chemical vapor deposition is not physical vapor deposition or a type of physical vapor deposition.	A process [of accumulating material] in which films are precipitated from the gas phase by a chemical reaction [of reactant species that have been transported to the deposition surface by thermal diffusion].
sputtering	A type of physical vapor deposition in which a solid target is bombarded with high energy ions physically to dislodge the surface atoms on the target into a vapor phase for accumulation on the deposition surface <del>without undergoing a chemical reaction.</del>	A process in which atoms from near the surface of a material are physically dislodged by an incoming ion.
rounding	This term is indefinite.	Reducing the sharpness of the top edge of the opening.

**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2007, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to the following:

John G. Day, Esquire  
Steven J. Balick, Esquire  
ASHBY & GEDDES

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on December 13, 2007 upon the following individuals in the manner indicated:

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